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TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION  
EPA CONTRACT 68-01-7367

Mr. Duane Heaton  
Deputy Project Officer  
Emergency Support Section, 5HS-11  
U.S. Environmental Protection Agency  
230 South Dearborn Street  
Chicago, IL 60604

*Interim* *RA*

November 15, 1989

TAT-05-G2-01474

Re: Chicago Industrial Waste Haulers, Alsip, Illinois  
TDD#5-8905-11

Dear Mr. Heaton

On October 19, 1989, Section Chief Jack Barnette of the U.S. Environmental Protection Agency (U.S. EPA) Emergency and Enforcement Branch tasked the Technical Assistance Team (TAT) to review the potentially responsible party (PRP) contractor work plan, prepared by Glenn Kuntz of Plexus Engineering Group, Ltd. The work plan details soil sampling, remedial operations, and final closure plan activities at the Chicago Industrial Waste Haulers, Inc. (CIWH) site in Alsip, Illinois.

The following suggestions were generated upon reviewing the proposed work plan:

- Pg. 4 The work plan needs to address the potential cleanup of adjacent land, if sampling indicates contamination.
- Pg. 5 Air monitoring should be conducted at the beginning of each new activity on site according to Occupational Health and Safety Administration (OSHA) standards.
- Pg. 6 Level C protection will be required for soil sampling.  
  
40 hour OSHA training and medical records of all personnel working on site will be available for inspection by the On-Scene Coordinator (OSC).
- Pg. 8 All tanks should be monitored with a combustible gas indicator (CGI) to ensure that flammable vapors are below the lower explosive limit prior to thermal cutting.

Roy F. Weston, Inc.

SPILL PREVENTION & EMERGENCY RESPONSE DIVISION

In Association with ICF Technology Inc., C.C. Johnson & Malhotra, P.C., Resource Applications, Inc.,  
Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.

Pg. 8        Include tank cleaning procedure in the work plan. How will solidified sludge, which is still adhering to the interior of the tanks, be scraped off prior to the disposal of the steel?

The tank dismantling procedure needs to be more detailed, i.e., will cherry pickers be used when cutting the tops of tanks.

Pg. 10       The soil outside the property boundaries to the northeast and northwest will be sampled in the extent of contamination (EOC) study.

Grid spacing will be 40 feet, not 50 feet as stated.

Pg. 11       Insert "The OSC may request samples from any location in addition to the grid locations."

Pg. 12       Depth sampling will be conducted to determine vertical EOC. Samples will be collected until contaminants are undetectable or at the predetermined clean-up level.

Will one sample be collected from each grid point or will composites be made from samples at different grid points?

Pg. 14       The soil gas investigation methodology is inadequate. The samples may only be screened by an HNU. From the results of the HNU monitoring, contaminated areas can be identified and regrided for further sampling. Samples collected within the highly contaminated areas will be sent to the laboratory for volatile organic compound (VOCs) analysis.

All samples collected will be analyzed for polychlorinated biphenyls (PCBs). Areas of elevated PCB concentrations will be regrided at smaller intervals and resampled until the EOC is thoroughly determined.

Depth samples will also be collected at the same location of surface samples with elevated concentrations until vertical EOC is determined. This methodology will also be applied to the determination of the EOC of VOCs.

Mr. Duane Heaton

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Pg. 16      The quality assurance plan (QAP) of the selected laboratory must be submitted to and approved by the OSC prior to use.

The contractor must provide a QAP for sampling on site which should include the number of duplicate and background samples which will be collected as well as analyses to be performed, detection limits, etc. Refer to Solid Waste-846.

Pg. 19      A geophysical study should be conducted to determine location of underground tanks and buried drums prior to digging trenches.

Pg. 20      No soil will be excavated until it has been sampled and soil will be stockpiled according to the analytical results.

After removal of buried drums or tanks, a composite sample of the underlying soil will be collected to determine the level of contamination prior to excavation. Visual inspection is inadequate.

Pg. 22      How will the inflow of water into the excavation areas be controlled? Water will not be discharged off site until the water is analyzed for PCBs and VOC contamination.

Pg. 23      Tanks will be decontaminated, removed and disposed of in accordance with 29 CFR 1910.120 (j).

When handling drums or tanks containing unknown contents, Level B (described in the safety plan) will be used.

PCIA is not allowed to dispose of on site materials at this time.

Pg. 24      Drums will not be picked up and agitated prior to opening. If stability of drums is questionable upon visual inspection, the drum will be overpacked. Over packs should be available at all times.

The procedure of dealing with the drums is not clear.

All drums should be opened, sampled, and analyzed on-site or at a laboratory for compatibility.

- Pg. 26      The OSC may request that excavated areas be sampled to determine whether the soil is contaminated.
- All drums will be handled in Level B.
- Pg. 27      Drum contents cannot be classified based on organic vapor detector readings.
- Liquids should not be removed from drums. Drum contents will not be segregated by matrix.
- Pg. 28      A complete compatibility testing procedure should be included.
- Water reactive material will not be reacted on site. Any on-site treatment must be approved by the OSC.
- Pg. 31      PCIA may not separate, test, stage or bulk any material encountered on site.
- Solidification of on-site material must be approved by the OSC.
- Analysis of waste for ultimate disposal must be performed by a laboratory approved by the OSC. The Quality Assurance/Quality Control (QA/QC) plan must be included in the waste plan.
- Pg. 32      The ultimate disposal site must be a Resource Conservation and Recovery Act (RCRA) approved facility and consistent with the U.S. EPA off-site policy.
- Pg. 32      Department of Transportation (DOT) regulations must be followed when transporting hazardous waste.
- Pg. 33      Manifests will be signed by representative of PCIA, not the OSC.
- Pg. 36      The level of protection will be determined by the OSC.
- General  
Comments: A revised work plan must be submitted by the contractor to include all activities conducted on site. All medical records and proof of 40 hour training for workers on-site must be provided by the contractor.



Mr. Duane Heaton

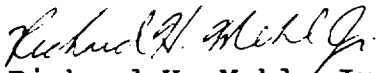
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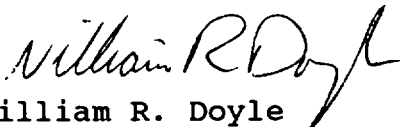
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Should you have any questions or require additional information, please feel free to contact us.

Very truly yours,

ROY F. WESTON, INC.

  
Richard H. Mehl, Jr.  
Environmental Engineer

  
William R. Doyle  
Technical Assistance Team  
Leader, Region V

RHM:dn  
cc: J. Barnette, OSC